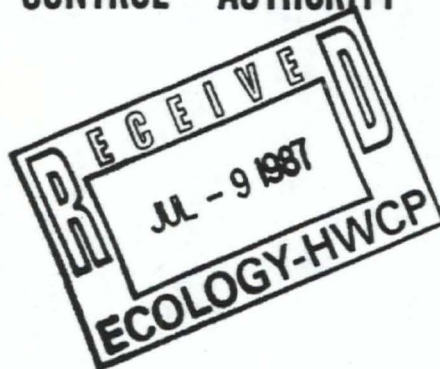




AIR POLLUTION CONTROL AUTHORITY

TELEPHONE:
(509) 456-4727

June 30, 1987



Mr. Fred Gardner
Department of Ecology
M/S PV-11
Olympia, WA, 98504

Re: Spokane County Air Pollution Control Authority (SCAPCA) review of the
Colbert Landfill Feasibility Study

Dear Mr. Gardner:

We have reviewed the feasibility study for the remedial alternatives to deal with the contamination at the Colbert Landfill. We feel that the study does not adequately address the environmental hazards and potential human health risks when the volatile organic compounds are removed from the water and emitted into the air stream. We feel that air pollution controls on the recommended air stripping system are absolutely necessary.

The risk assessment methodology only included the evaluation of exposure and toxicity for contaminated groundwater and indoor air exposure from household water usage activities. The SCAPCA feels that the risk assessment should also include an analysis of the discharge of these contaminants to the ambient air from the air stripping system. The analysis should address the potential health effects which could occur from releasing the estimated 10.3 tons per year of these volatile organic compounds into the air (Appendix F, Evaluation of Emissions From Air Strippers). The assessment should include computer modeling of the possible air pollution impacts using approved Environmental Protection Agency models.

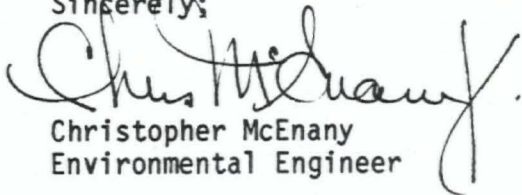
The SCAPCA also feels that a complete analysis of air pollution control systems should be done. The analysis should be done to determine the Best Available Control Technology (BACT). WAC 173-403-030(8) defines BACT and the degree of analysis necessary. WAC 173-403-050 as well as SCAPCA Regulation I Article V requires the use of Best Available Control Technology for new sources of air pollution.

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We hope you will consider our comments when making your decision. We would also like to be kept up to date with all actions concerning the Colbert Landfill. Should you have any questions concerning our comments please call this office at 272-4727 (SCAN).

Sincerely;

A handwritten signature in black ink, appearing to read "Chris McEnany". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Christopher McEnany
Environmental Engineer

Spokane County Air Pollution
Control Authority